

Form Title: Bribery Policy
Form Ref: SDSP5
Author: SDS
Date: November 2022
Version: V1.3



ANTI-BRIBERY POLICY

Introduction

The Company is committed to implementing and enforcing effective systems to counter bribery. Therefore, it is the Company's policy to conduct all aspects of its business in an honest and ethical manner at all times.

Under UK law (UK Bribery Act 2010), bribery and corruption is punishable for individuals by up to ten years imprisonment. If the Company is found to have taken part in the corruption or lacks adequate procedures to prevent Bribery, it could face an unlimited fine and be excluded from tendering for Government contracts.

Policy

The aim of this policy is to help the Company act in accordance with the Bribery Act 2010, maintain the highest possible standards of business practice, and advise individuals of the Company's 'zero-tolerance' to bribery.

This policy applies to all permanent and fixed-term staff employed by the Company, and any contractors, consultants or other persons acting under or on behalf of the Company.

The Company will not:

- Make contributions of any kind with the purpose of gaining any commercial advantage.
- Provide gifts or hospitality with the intention of persuading anyone to act improperly, or to influence a public official in the performance of their duties.
- Make, or accept, "kickbacks" of any kind.

Genuine hospitality or similar business expenditure that is reasonable and proportionate is not prohibited by the Act.

Company Responsibility

The Company will:

- Keep appropriate internal records that will evidence the business reason for making any payments to third parties.
- Encourage employees to raise concerns about any issue or suspicion of malpractice at the earliest possible stage.
- See that anyone raising a concern about bribery will not suffer any detriment as a result, even if they turn out to be mistaken.

To prevent Bribery, we should:

- Assess whether business is at risk and, if so, the level of that risk put in place procedures proportionate to the risk identified
- Show a clear commitment to the prevention of bribery
- Use due diligence to assess who we are dealing with and who we appoint to represent us, communicate, train and raise awareness among employees and business partners to monitor and review procedures

Employee Responsibility:

Employees must not:

- Accept any financial or other reward from any person in return for providing some favour.
- Request a financial or other reward from any person in return for providing some favour.
- Offer any financial or other reward from any person in return for providing some favour.

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Non Compliance

All employees have a role to play in enforcing the policy and are required to deal with any observed or reported breaches. Should employees feel apprehensive about their own safety in regard to addressing any breach, they should seek support from Director, Nolan Forwood or other senior management.

Failure to comply with this policy may lead to a lack of clarity over job role, learning needs or expected standards of performance, resulting in reduced effectiveness or efficiency, underperformance and putting service delivery at risk.

Any member of staff refusing to observe the policy will be liable to disciplinary action in accordance with the Company's Disciplinary Policy up to and including dismissal.

Where a criminal offence has occurred, the company must report violations to the Police or relevant regulating authority for further investigation.

Implementation of the Policy

Overall responsibility for policy implementation and review rests with the Company Director. However, all employees are required to adhere to and support the implementation of the policy. The Company will inform all existing employees about this policy and their role in the implementation of the policy. They will also give all new employees notice of the policy on induction to the Company.

This policy will be implemented through the development and maintenance of procedures for appraisals and one-to-one meetings, using template forms, and guidance given to both managers and employees on the process.

Monitoring Policy

The policy will be monitored on an on-going basis, monitoring of the policy is essential to assess how effective the Company has been.

Reviewing Policy

This policy will be reviewed at least annually and, if necessary, revised in the light of legislative or codes of practice and organisational changes. Improvements will be made to the management by learning from experience and the use of established reviews.

Policy Amendments

Should any amendments, revisions, or updates be made to this policy it is the responsibility of the Company senior management to see that all relevant employees receive notice. Written notice and/or training will be considered.

Additional Information

If you require any additional information or clarification regarding this policy, please contact your manager. In the unlikely event where you are unhappy with any decision made, you should use the Company's formal Grievance Procedure.

To the extent that the requirements of this policy reflect statutory provisions, they will alter automatically when and if those requirements are changed.

Signed:

Role: Director

Date: October 2025